

Richard A. Kaplan  
YOUNG HOFFMAN, LLC  
175 South Main Street, Suite 850  
Salt Lake City, UT 84111  
Telephone: 801-359-1900  
Email: [rkaplan@yahlaw.com](mailto:rkaplan@yahlaw.com)  
Attorneys for \_\_\_\_\_

UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

APOTHECARY MOVEMENT, LLC, a Utah  
limited liability company,

Plaintiff,

vs.

BH ELEGANT LINENS, LLC dbas AA  
WHOLESALE DEALS; and SWIFT  
INNOVATIONS, a New York limited liability  
company,

Defendants.

DECLARATION OF AVI ALHAKIM IN  
SUPPORT OF MOTION TO SET ASIDE  
DEFAULT JUDGMENT AND TO  
VACATE WRIT OF GARNISHMENT  
FOR LACK OF JURISDICTION

Civil No. 2:23-cv-00845-HCN-DAO

Judge Howard C. Nielson, Jr.

I, Avi Alhakim, a resident of the State of New Jersey, United States of America, hereby  
Declare under oath and penalty of perjury as follows:

1. I am the member-manager of Swift Innovations, LLC, a New Jersey Limited Liability  
Company and, having caused Swift Innovations, LLC to be formed, I have firsthand  
knowledge of its formation as a legal entity under the laws of New Jersey.
2. I was previously member-manager of BH Elegant Linens, LLC, a New York Limited  
Liability Company and, having caused BH Elegant Linens, LLC to be formed, I have  
firsthand knowledge of its formation as a legal entity under the laws of New York.

3. Swift Innovations, LLC was formed on October 17, 2023. Exhibit 1 is a true and accurate copy of the Certification of Formation I received on or about that date from the New Jersey Department of the Treasury, Division of Revenue and Enterprise Services.
4. The Internal Revenue Service on October 17, 2023 assigned Swift Innovations, LLC, Employer Identification No. 93-3947224. Exhibit 2 is a true and accurate copy of a notice I received on or about that date from the IRS assigning Swift that Employer Identification Number.
5. BH Elegant Linens, LLC was formed on November 23, 2020. Exhibit 3 is a true and accurate copy of the Articles of Organization of BH Elegant Linens, LLC on or around that same date.
6. Exhibit 4 is a true and accurate copy, with financial information redacted, of the 2022 federal tax return for BH Elegant Linens, LLC, reflecting that the IRS assigned BH Elegant Linens, LLC, Employer Identification No. 85-4002137.  
of December 1, 2023.

Further Declarant sayeth not.

Dated: April 15, 2024

Signed: Aw Adelby

Subscribed and sworn before me:

TUNIE JARADEH  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01JA6362867  
Qualified in Kings County  
Commission Expires August 7, 2025 Thurill